

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA

Quentes Wells, #245021,

Plaintiff,

vs.

Ofc. Christopher Broad, Ofc. Mr. Kelly,
Lt. Ms. Salmond, and Sgt. Mr. Baker,

Defendants.

Civil Action No.: 4:14-cv-2572-RBH-TER

**AFFIDAVIT OF
RICHARD E. MARSH, III**

PERSONALLY APPEARED BEFORE me, Richard E. Marsh, III, who first being duly sworn, deposes and avers the following:

1. This law firm has been retained to represent the Defendants Christopher Broad, Thomas Kelly and Rodney ("Defendants") in the above-referenced lawsuit.

2. Plaintiff, a *pro se* inmate housed at Allendale Correctional Institution of the South Carolina Department of Corrections, filed this action pursuant to 42 U.S.C. § 1983. He has alleged that his Constitutional rights were violated by the Defendants during his period of incarceration.

3. Pursuant to the Magistrate's Order issued by the Honorable Thomas E. Rogers, III on March 23, 2015, dispositive motions in this case are due no later than March 28, 2015. (ECF No. 50).

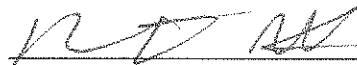
4. These Defendants now respectfully request an additional seven (7) days, or until April 4, 2015, in which to file their dispositive Motions.

5. Counsel for the Defendants deposed the Plaintiff, who at his deposition identified three alleged (3) fact witnesses who are inmates incarcerated in the South Carolina Department of Corrections and identified new additional documents related to Plaintiff's allegations.

6. While for counsel for these Defendants has begun the investigation into the newly raised information and witnesses in light of Plaintiff's deposition, this investigation is not yet complete and further time is needed to obtain those affidavits needed to file proper dispositive motions.

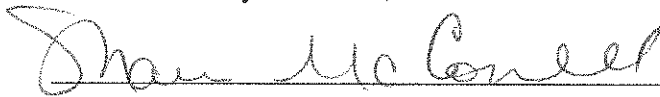
7. The undersigned is informed and believes the Court's granting of the requested extension of time to file dispositive motions on behalf of these Defendants will not prejudice the Plaintiff in any way, will not affect any other deadlines, and will not unduly delay the scheduling in this case.

FURTHER THE AFFIANT SAYETH NOT.


Richard E. Marsh, III

SWORN TO AND SUBSCRIBED BEFORE ME

this 30 day of March, 2015.


Notary Public for South Carolina

My Commission Expires: My Commission Expires June 14, 2016